

1 Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
2 Santa Monica, CA 90403
Tel.: (424) 278-3017
3 Email: 2@lucasmurrey.io
Website: lucasmurrey.com
4 SocialMedia: sickoscoop.com/lucas

5 Plaintiff & Plaintiff in Pro Se

6
7 **UNITED STATES BANKRUPTCY COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 In re:

10 MS. AMY LYNNE BLALOCK, an
11 individual;
Debtor,

12 DR. STEWART LUCAS MURREY, an
13 individual;
Plaintiff,

14 MS. AMY LYNNE BLALOCK, an
15 individual;
16 Defendant.

Adversary Complaint Case No.

24-ap-01152-BR

[Assigned to: Hon. Judge Barry Russell]

Related: Bankruptcy Case No.

24-bk-12532-BR-Chapter 7

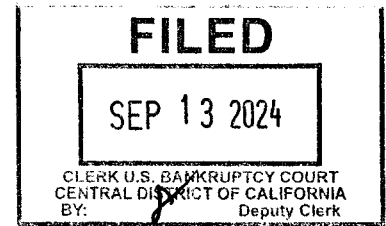
[Assigned to: Hon. Judge Barry Russell]

**FIRST AMENDED ADVERSARY
COMPLAINT FOR:**

- 17 1) Defamation – Libel *per se*
- 18 2) False Light
- 19 3) Intentional Infliction of
Emotional Distress
- 20 4) Misappropriation of Name and
Likeness
- 21 5) Unjust Enrichment
- 22 6) Negligence
- 23 7) Cyberbullying
- 24 8) Civil Conspiracy
- 25 9) Declaratory Relief
Exemplary Damages

Jury Demand

Judge: Hon. Barry Russell



1 Plaintiff DR. STEWART LUCAS MURREY alleges and states as follows:

2 **I. VENUE AND JURISDICTION**

- 3 1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. §§
4 1334 and 157(b)(2)(j).
5
6 2. The last date for filing complaints to determine the dischargeability of debts
7 pursuant to 11 U.S.C. § 523 is 1 July 2024.
8
9 3. Venue in this action is proper in this Court pursuant to 28 U.S.C. § 1409.
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11 4. The Debtor and Defendant AMY LYNNE BLALOCK (“Defendant” and
12 “Ms. Blalock”) filed her voluntary petition under Chapter 7 of the Bankruptcy
13 Code on 2 April 2024 in the United States Bankruptcy Court for the Central
14 District of California, Case No. 2:24-bk-12532-BR.

15 **II. PARTIES**

- 16
17 5. At all times material hereto, Creditor and Plaintiff, DR. STEWART LUCAS
18 MURREY (“Plaintiff” and “Dr. Murrey”) is an individual who resides in the
19 County of Los Angeles.
20
21 6. The Debtor and Defendant, Ms. Blalock, is an individual who resides in the
22 County of Los Angeles.

23 **III. FIRST CLAIM FOR RELIEF FOR NON-DISCHARGEABILITY OF**
24 **JUDGMENT DEBTS BASED ON 11 U.S.C. § 523(a)(6) – WILLFUL**
25 **AND MALICIOUS PERSONAL INJURY**
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- 1 7. Plaintiff repeats and realleges the allegations contained in paragraphs 1-6,
2 inclusive, and by reference thereto incorporates the same herein as though
3 fully set forth at length.
- 4
5 8. On 27 June 2023 Plaintiff filed a complaint against Ms. Blalock for general,
6 special and punitive damages incurred as a result of Blalock's participation in
7 a conspiracy to gang-stalk, harass, defame, impersonate and cyberbully
8 Plaintiff. Further, Ms. Blalock knew and intended that her statements would
9 result in harming Plaintiff by portraying him in false light (See Los Angeles
10 County Superior Court Case No. 23STCV14890).
- 11
12
13 9. Said Los Angeles County Court recently ruled that Ms. Blalock's Special
14 Anti-SLAPP Motion to Strike failed to dismiss Plaintiff's causes of action for
15 1) Libel; 2) Libel *per se*; and 3) False Light, all of which survive and are
16 currently pending. Herein said other deemed that Plaintiff's lawsuit has a
17 clear likelihood of prevailing on the above-noted causes of action.
- 18
19 10. Said state case is currently pending; Plaintiff reasonably requires discovery
20 responses from Ms. Blalock, in particular because of the nature of the online
21 conspiracy in which Blalock participated: one that aggressively uses
22 anonymity, secrecy and any and all crimes to hide from justice. Thus Plaintiff
23 urgently needs to litigate his case against Ms. Blalock and her co-conspirators
24 in their almost decade-long online secret and anonymous conspiracy to gang-
25 stalk and cyberbullying Plaintiff.
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1 11. Following diligent research and after obtaining new evidence Plaintiff has
2 since filed a motion for leave to file a second amended complaint in said state
3 case with the following causes of action: 1) Defamation – Libel; 2)
4 Defamation – Libel *per se*; 3) False Light; 4) Intentional Infliction of
5 Emotional Distress; 5) Misappropriation of Name and Likeness; 6) Civil
6 Harassment; 7) Unjust Enrichment; 8) Sex-Based Discrimination In Violation
7 Of The Unruh Civil Rights Act (California Civil Code § 51); 9) Gender
8 Violence In Violation Of California Civil Code § 52.4; 10) Cyberbullying;
9 11) Conspiracy to Violate Plaintiff’s Reputation and Identity; Plaintiff’s Right
10 to Free Speech; to Harass him; to Cause him Emotional Distress; to Obtain
11 Unjust Enrichment; to Discriminate against Plaintiff’s Sex; and to Cyberbully
12 Plaintiff; and 12) Declaratory Relief that is currently set to be heard on 4
13 November 2024.

14 12. By engaging in the above-noted acts and conduct i.e. heinous Facebook
15 savagery etc. alleged, Ms. Blalock willfully and maliciously injured Plaintiff.

16 13. Plaintiff was damaged as a result of Ms. Blalock’s actions herein and she has
17 been properly served a Statement of Damages on on 19 December 2023 from
18 said state case for 2.6 million dollars (\$2,600,000.00).

19 14. As noted above, this state case is currently pending; its likelihood of
20 prevailing on the above-noted causes of damages, including Libel *per se*, has
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1 been established by said state Court; discovery is critical; and the forthcoming
2 debt that Ms. Blalock shall have to Plaintiff is significant.

3 15. Along with her utter lack of remorse or reflection, Ms. Blalock has failed to
4 provide any compensation to Plaintiff whatsoever.

6 16. Plaintiff asserts, as alleged herein, that any and all future and/or forthcoming
7 debts of Ms. Blalock to Plaintiff are not dischargeable per 11 U.S.C. §
8 523(a)(6), based on the willful, malicious and intentional personal injury to
9 Plaintiff committed by Ms. Blalock.

11 **IV. BACKGROUND AND STATEMENT OF FACTS**

12 17. Plaintiff repeats and realleges the allegations contained in paragraphs 1-16,
13 inclusive, and by reference thereto incorporates the same herein as though
14 fully set forth at length.

15 18. During 2023 plaintiff obtained evidence from various sources that sometime
16 around 2019 and/or 2020,¹ defendants began to post harmful statements about
17 him online. This occurred in online forums such as, but not limited to
18 Facebook's forums "Are We Dating The Same Guy?" ("AWDTSG") which is
19 linked to various cities and counties around the world and which has tens of
20 millions of users.

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28 ¹ The exact time is still to be determined because Facebook refuses to be transparent about the
publication dates of statements from its groups.

1 19. An anonymous Facebook account stated that “[p]ublic records show [that] he
2 [plaintiff] has several domestic violence charges filed against him plus
3 involvement in [a] MURDER case of his ex wife” that plaintiff “is
4 DANGEROUS”; and that plaintiff “[f]iled 11 court cases against women in
5 33 months trying to extort money from them”.

7 20. Kelly Gibbons stated that plaintiff “pressed lawsuits against a number of
8 women to extort money from them and was suspected in the murder of his
9 ex[-]wife”; that plaintiff engages in “extortion lawsuits”; is under “murder
10 suspicion” – presumably for murdering his girlfriend who passed from cancer
11 in 2018 –; that plaintiff is guilty of “fraudulent behavior”, “using a false
12 identity”, “posing a significant risk of attempting to obtain money from other
13 users through deceitful means”, is “suing a company that catches cheaters and
14 the suspicion of murdering his wife?! Dateline vibes”, that plaintiff is
15 “obviously a predator”, whose Ph.D from Yale University is fraudulent.

16 21. An anonymous group member stated plaintiff “killed” his “ex”; that plaintiff
17 has committed “crimes!”; that plaintiff “said he was an [a]ttorney”; and that
18 the online dating app “[H]inge” banned him “for fraudulent behavior”.

19 22. Amy Blalock stated that “I’m afraid if there’s any missing women in LA – he
20 [plaintiff] has something to do with it” and that “[h]e [plaintiff] [i]s going to
21 end up on Dateline one day.”
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1 23.Elly Shariat stated that plaintiff aggressively stalked her via her Instagram
2 posts and finally tracked her down at a hotel in Beverly Hills whereat plaintiff
3 grabbed her wrist violently and acted so harassingly that even years later
4 Shariat is unable to sleep and still wakes up in terror.
5

6 24.Lena Vanderford stated that plaintiff is an “abusive murderer”; that he has
7 acted “Fraudulent”; that “He is truly dangerous”; and Vanderford posted
8 statements that “[p]ublic records show [that] he [plaintiff] has several
9 domestic violence charges filed against him plus involvement in [a]
10 MURDER case of his ex wife” that plaintiff “is DANGEROUS”; and that
11 plaintiff “[f]iled 11 court cases against women in 33 months trying to extort
12 money from them”.
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15 25.Ainka Wiz stated that plaintiff was “a murder suspect” and that “exes has
16 accused him of stds”.
17

18 26.And Kelyn Rodriguez stated that plaintiff was “on the ca [California]
19 court[‘]s listing” because “He’s been labeled a vexatious litigator”.
20

21 27.By posting about plaintiff in AWDTS G i.e. “Are We Dating The Same Guy”
22 each of the above-noted defendants also implied that plaintiff was unchaste
23 i.e. cheats on all women.
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25 28.On 7 February 2024 defendants Gibbons, Blalock, Shariat, Rodriguez,
26 Vanessa Valdes, Liv Burger and anonymous defendant initiated a GoFundMe
27 webpage whereupon they stated that plaintiff aggressively stalked Shariat via
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1 her Instagram posts and finally tracked her down at a hotel in Beverly Hills
2 whereat plaintiff grabbed her wrist violently and acted so harassingly that
3 even years later Shariat is unable to sleep and still wakes up in terror.
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5 29. On or just before 13 April 2024 Poer-Anthony stated to the *Daily Mail* for an
6 article they published on said date that plaintiff “stalked” her daughter
7 Shannyn Poer.
8

9 30. On or about 12 April 2024 Valdes filed a police report against plaintiff
10 wherein she claimed that plaintiff had “doxed” her i.e. electronically harassed
11 her by posting harmful information online (California Penal Code § 653.2).
12

13 31. All of the above-noted statements about plaintiff are false. Further, plaintiff
14 has never been charged, much less convicted of any crime his entire life.
15

16 32. Although not a Facebook user, plaintiff in good faith diligently contacted
17 Facebook and other related platforms and put them all on notice about this
18 conspiracy to harm him and for them to preserve any and all related evidence.
19

20 33. Facebook et al. failed to respond and continue to fail to respond still today;
21 and plaintiff filed LAPD and FBI reports just before filing this lawsuit.
22

23 34. There are hundreds of different Facebook accounts involved in this
24 conspiracy in AWDTS to harm plaintiff and tens of millions of users on
25 Facebook have seen the statements harming plaintiff where they were
26 published and aggressively promoted.
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1 35. Because plaintiff is a man i.e. his sex happens to be male, he was and is
2 excluded from said Facebook AWDTSO groups.

3 36. Said sexual discrimination is part of the design of the conspiracy to harm
4 plaintiff.
5

6 37. Those involved in posting harmful statements about plaintiff were fully aware
7 that because his sex is male plaintiff would never be admitted to join these
8 Facebook groups.
9

10 38. Worse, defendants conspired to keep plaintiff unaware of their online gang-
11 stalking and cyberbullying of him. This way defendants intended to
12 maliciously deny plaintiff his right to exercise free speech and defend
13 himself, first in bad faith by keeping him uninformed; next by refusing to
14 allow him to join the Facebook forums to defend himself with free speech.
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17 39. Online stalking and harassing led to off-stalking and harassment. Defendants'
18 conspiracy expanded to tracking plaintiff's whereabouts, contacting his loved
19 ones, digging up plaintiff's personal information to put on public display, and
20 conspiring to harm them. This was witnessed by several people who warned
21 plaintiff who was forced to alert his family and friends, change his parking
22 location, look for trackers on his car, change his work address, change his
23 phone number and email address, and close off to the public world while said
24 cyberbullying and off-line attacks continued, including death threats.
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1 40. After filing this lawsuit defendants then initiated a national and international
2 news media smear campaign on plaintiff whereby they continued their
3 harassment and defamation and even profited unjustly e.g. on charity websites
4 such as GoFundMe.
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6 41. Still today defendants' assault on plaintiff online and offline continues.

7 42. Because of defendants' actions plaintiff has incurred substantial monetary
8 damages.
9

10 **V. CLAIM FOR DEFAMATION – LIBEL (*PER SE*)**

11 43. Plaintiff repeats and realleges the allegations contained in paragraphs 1-16,
12 inclusive, and by reference thereto incorporates the same herein as though
13 fully set forth at length.
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15 44. As noted above, Blalock aggressively participated in the above-noted
16 conspiracy to harm plaintiff as when Blalock stated that "I'm afraid if there's
17 any missing women in LA – he [plaintiff] has something to do with it" and
18 that "[h]e [plaintiff] [i]s going to end up on Dateline one day."
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21 45. Each of these statements was viewed by tens of millions of Facebook users
22 for at least two (2) years.
23

24 46. Said viewers reasonably understood that these statements were about plaintiff.

25 47. Blalock failed to use reasonable care to determine the truth or falsity of these
26 statements.
27

28 48. Defendant's wrongful conduct constitutes defamation *per se*.

1 49. Defendant's wrongful conduct was a substantial factor in causing harm to
2 plaintiff's reputation and caused shame, ridicule, mortification and hurt
3 feelings to plaintiff.

4
5 50. Accordingly, plaintiff has been seriously damaged mentally and emotionally.
6 Said damages that shall be determined at trial, are believed to exceed \$2.6
7 million, exclusive of legal fees, costs and statutory interest.

8
9 51. In addition, because defendant's conduct was so outrageous, plaintiff seeks
10 punitive damages in an amount that will punish defendant from ever engaging
11 in said conduct and an amount that will deprive defendant of all benefit,
12 financial or otherwise, of her defamatory statements.
13

14 VI. CLAIM FOR FALSE LIGHT

15 52. Plaintiff repeats and realleges the allegations contained in paragraphs 1-52,
16 inclusive, and by reference thereto incorporates the same herein as though
17 fully set forth at length.
18

19 53. Blalock stated that she secretly recorded plaintiff: "I have a work phone and
20 personal phone. I put them stacked on the bar in front of me and one of them
21 was recording. About 5 mins into sitting there, he [plaintiff] grabbed both of
22 my phones [...]"
23

24
25 54. This statement is false. Plaintiff has no memory of Blalock, nor of meeting
26 her, he never gave her consent to record him and he never grabbed Blalock's
27 phone or phones.
28

1 55. Furthering the conspiracy to harm plaintiff Blalock stated: “I’m afraid if
2 there’s any missing women in LA – he [plaintiff] has something to do with
3 it.”. Blalock repeats her accusations that plaintiff is guilty of kidnapping and
4 murdering women. In fact, Blalock promotes Gibbons’ conspiracy to
5 associate plaintiff with real serial killers on TV: “He’s going to end up on
6 Dateline one day.”

8 56. Blalock’s admission that she secretly recorded plaintiff is a part of Gibbon’s
9 conspiracy to create a harmful movie about plaintiff painting him as a
10 murderer, extortionist, etc. by secretly defaming him in AWDTSF Facebook
11 forums while publicly planting “seeds of speculation”.
12

13 57. Blalock states directly to Gibbons that their new “documentary” about
14 plaintiff should be “like *The Tinder Swindler*: a documentary about the Israeli
15 criminal Shimon Hayut (aka *the Tinder Swindler*) who has been convicted of
16 stealing large amounts of money, fraud, deceit and more.
17

18 58. Starting with the above-noted false allegations of murder, violence, stalking,
19 extortion, fraud, and identity theft, the group quickly spun out of control.
20 Under the unwavering persistence of Gibbons and Blalock, the acts of this
21 group expanded to tracking the plaintiff’s whereabouts, contacting his loved
22 ones, digging up his personal information to put on public display, and
23 conspiring to harm them. Taking these chats offline and holding them in
24 separate private discussions while keeping them secret, the group tactically
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1 formed to humiliate, harass, and “dox” plaintiff after conspiring to stalk him
2 and his loved ones.

3 59. Defendant publicly disclosed information or material without plaintiff’s
4 consent or giving him notice, that include, but is not limited to plaintiff’s
5 phone number, images of him, his private address, his private text messages,
6 the name of his girlfriend who passed from cancer in 2018, articles, videos
7 and images from plaintiff’s personal copyrighted website and court
8 documents related to his previous actions that all showed plaintiff in a false
9 light.
10

11
12 60. Defendant made said disclosure to make it seem like plaintiff had committed
13 acts of murder, extortion, fraud, domestic violence, stalking; that he had
14 STDs; that he was unchaste; and that his Ph.D was fake.
15

16
17 61. Defendant made said disclosures to tens of millions of people online via
18 Facebook forums and via local, national and international news media outlets
19 and via the police and other such agencies and outlets.
20

21 62. All of the above-noted images that defendants knowingly created by said
22 disclosures are false and/or never occurred and would be highly offensive to a
23 reasonable person in plaintiff’s position.
24

25 63. There is clear and convincing evidence that defendant knew that their
26 disclosure would create a false impression about plaintiff and they acted with
27 reckless disregard for the truth.
28

1 64. Defendant was negligent in determining the truth of the information and
2 whether a false impression would be created by this disclosure.

3 65. Defendant's conduct was a substantial factor in causing plaintiff's harm.

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5 **VII. CLAIM FOR INTENTIONAL INFLICTION OF EMOTIONAL**
6 **DISTRESS**

7 66. Plaintiff repeats and realleges the allegations contained in paragraphs 1-66,
8 inclusive, and by reference thereto incorporates the same herein as though
9 fully set forth at length.

10
11 67. Defendant's conduct of gang-stalking, stalking, defaming, cyberbullying
12 plaintiff online and off-line was and is outrageous.

13
14 68. Defendant intended to cause plaintiff emotional distress.

15 69. Defendant acted with reckless disregard for the probability that plaintiff
16 would suffer emotional distress, knowing that plaintiff was the subject when
17 their conduct occurred.

18
19 70. Plaintiff suffered emotional distress; and Defendant's conduct was a
20 substantial factor in causing plaintiff severe emotional distress.

21
22 71. As the actual and proximate result of the intentional acts of defendants,
23 plaintiff suffered serious, lasting emotional distress, including but not limited
24 to: emotional distress, mental and physical harm, post-traumatic stress
25 syndrome, mortification and grief.
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1 72. Plaintiff has had to hire and retain physicians and health care professionals to
2 treat him for the psychological and physical harm he has suffered and
3 continues to suffer. Plaintiff has suffered medical special damages and
4 incurred medical bills and has suffered general damages of fright, pain, grief,
5 mortification and harm, all in amounts to be proven at the time of the trial
6 herein.
7

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9 **VIII. CLAIM FOR MISAPPROPRIATION OF NAME AND LIKENESS**

10 73. Plaintiff repeats and realleges the allegations contained in paragraphs 1-72,
11 inclusive, and by reference thereto incorporates the same herein as though
12 fully set forth at length.
13

14 74. Sometime in 2024 anonymous defendants used plaintiff name to create a
15 Facebook account: "Stewart Lucas Murrey Clown" with images of plaintiff.²
16 Sometime prior to and or around 2024 anonymous defendants developed
17 email addresses and other social media accounts with plaintiff's name and/or
18 clear references to plaintiff's identity, including, but not limited to
19 lucasmurrey123@gmail.com and drluc369@gmail.com.
20

21
22 75. Plaintiff did not consent to this use. There is a direct symbolic link between
23 the above-noted misappropriation of name and likeness of plaintiff and
24 defendants' GoFundMe webpage. This shows that defendants gained
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27
28 ² Facebook does not provide dates nor any transparency regarding those who gang-stalk, cyberbully or harm others, including impersonations.

1 commercial benefit and/or were able to further the harm they intended to
2 cause plaintiff through their above-noted misappropriation of name and
3 likeness of plaintiff. Further, defendants received money and other forms of
4 rewards for harming plaintiff on Facebook.
5

6 76.As a result of defendants' misappropriation of name and likeness of plaintiff
7 he was harmed.
8

9 77.Defendants' conduct was a substantial factor in cause plaintiff harm.

10 78.Unless and until enjoined and restrained by order of this Court, defendants'
11 wrongful conduct will continue to cause irreparable harm to plaintiff, entitling
12 him to seek declaratory relief.
13

14 **IX. CLAIM FOR UNJUST ENRICHMENT**

15 79.Plaintiff repeats and realleges the allegations contained in paragraphs 1-78,
16 inclusive, and by reference thereto incorporates the same herein as though
17 fully set forth at length.
18

19 80.Plaintiff incorporates all allegations of this complaint and re-alleges them as
20 though they were fully set forth herein.
21

22 81.Defendants unjustly enriched themselves based upon their defamation,
23 harassment and harm caused to plaintiff.
24

25 82.Specifically, defendants received money and other rewards on Facebook for
26 said harm, as well as at least \$5,747.00 via their GoFundMe webpage that
27 they initiated on 7 February 2024.
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1 83. Defendants have further made several statements regarding books,
2 documentaries etc. that they have sought to produce in regard to the harm
3 they have caused plaintiff and from which they intended to profit.
4

5 **X. CLAIM FOR NEGLIGENCE**

6 84. Plaintiff repeats and realleges the allegations contained in paragraphs 1-83,
7 inclusive, and by reference thereto incorporates the same herein as though
8 fully set forth at length.
9

10 85. Defendants owed plaintiff a duty of care to accurately represent him in their
11 Facebook forum, in their online charity webpage and in their media
12 representations all of which they held to be “true” to confirm the details of
13 allegations made about him.
14

15 86. Defendants breached their duty of care by lying repeatedly about plaintiff and
16 portraying him as a serial killer, etc. (as noted above).
17

18 87. As a result of defendants’ breaches plaintiff has been damaged severely and
19 has suffered among other things panic, fear, anxiety, sleeplessness and
20 despair.
21

22 88. Plaintiff has suffered severe emotional distress as a result of defendants’
23 negligence.
24

25 **XI. CLAIM FOR CYBERBULLYING**

1 89.Plaintiff repeats and realleges the allegations contained in paragraphs 1-88,
2 inclusive, and by reference thereto incorporates the same herein as though
3 fully set forth at length.
4

5 90.This is a good faith and well-research effort to enlarge and/or change, extend,
6 modify and/or reverse existing law.
7

8 91.Herein cyberbullying is understood as two or more online accounts targeting a
9 person for the sake of harassing or “doxing” or defaming or impersonating
10 said person’s name or likeness.
11

12 92.The serious harm caused by cyberbullying noted above escalates
13 significantly: 1) the greater the number of online users who witness said
14 conduct; 2) the victim is not given notice of said conduct; 3) the online
15 group(s) wherein members are making said statements refuse to allow the
16 victim, should he or she become aware of said conduct, to join the online
17 group(s) and defend him or herself; 4) those online users committing
18 cyberbullying use anonymous accounts such that their real-world identities
19 are masked by false and/or fake names; 5) the victim is gang-stalked; 6) the
20 online harassment also occurs off-line; and 7) as a result of this harm the
21 victim is reasonable forced to live in fear e.g. change phone numbers, move,
22 warn his or her loved ones.
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1 93. Given the seriousness of this severe form of attack, cyberbullying herein
2 carries treble punitive damages if any of the above-noted escalating
3 conditions occur.
4

5 94. In this case plaintiff was cyberbullied by hundreds of Facebook accounts who
6 posted the above-noted severely harmful statements to billions of users online
7 (Facebook is the the world's most popular social media platform, with
8 billions of daily users; he was never given notice and in fact defendants
9 conspired elaborately to keep him unaware of the harm they caused him; after
10 plaintiff discovered defendants' conduct, they refused to let him join the
11 Facebook forums such that they wanted him to have no defense against their
12 malicious crimes and civil torts; defendants consist mostly of anonymous
13 accounts with false and/or fake names which they used to gang-stalk plaintiff
14 online and offline, forcing him to to alert his family and friends, change his
15 parking location, look for trackers on his car, change his work address,
16 change his phone number and email address, and close off to the public world
17 while said cyberbullying and off-line attacks continued, including death
18 threats.
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23 95. Plaintiff is further informed and believes, and based thereon alleges, that
24 defendants, and each of them, acted and continue to act, with full knowledge
25 of the consequences and damage being caused to plaintiff, by defendants'
26 actions, and defendants' actions were, and are, willful, oppressive, and
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malicious. Accordingly, plaintiff is entitled to treble punitive damages against defendants, and each of them, in a sum according to proof at trial.

96. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of this action and therefore demand such reasonable attorneys' fees and costs as set by the court.

XII. CLAIM FOR CIVIL CONSPIRACY

97. Plaintiff repeats and realleges the allegations contained in paragraphs 1-96, inclusive, and by reference thereto incorporates the same herein as though fully set forth at length.

98. Defendants' conspired to gang-stalk, harass, defame, emotionally distress, impersonate, discriminate against and cyberbully plaintiff.

99. During their conspiracy defendants aggressively abused social media, recruited new members and elaborately plotted to "plant seeds of speculation" around their defamatory statements to deny plaintiff's basic rights to "life and liberty, acquiring possession, and protecting property, and pursuing and obtaining safety, happiness and privacy." Cal. Const. Art. I., § 1. Further, defendants also sought to profit from books, documentaries etc. that defendants planned to produce following said malicious harm.

100. Defendants coordinated their stories of plaintiff stalking and committing murder and how their statements could reach the most amount of

1 people to cause the most amount of harm, for instance, how defendants
2 initiated a media smear campaign after this case was filed.

3 101. Plaintiff is further informed and believes, and based thereon alleges,
4 that defendants, and each of them, acted and continue to act, with full
5 knowledge of the consequences and damage being caused to plaintiff, by
6 defendants' actions, and defendants' actions were, and are, willful,
7 oppressive, and malicious. Accordingly, plaintiff is entitled to treble punitive
8 damages against defendants, and each of them, in a sum according to proof at
9 trial.
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13 102. Plaintiff has incurred, and will continue to incur, attorneys' fees in the
14 prosecution of this action and therefore demand such reasonable attorneys'
15 fees and costs as set by the court.
16

17 **XIII. DECLARATORY RELIEF**

18 103. Plaintiff repeats and realleges the allegations contained in paragraphs 1-
19 103, inclusive, and by reference thereto incorporates the same herein as
20 though fully set forth at length.
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22 104. Because of the ongoing severe harm suffered by plaintiff, he requests
23 a judicial declaration for defendants to remove and/or delete any and all
24 defamatory and/or disparaging statements about plaintiff and/or statements
25 misrepresenting plaintiff.
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1 105. Further, plaintiff requests a judicial declaration prohibiting defendants
2 from repeating and/or circulating such defamatory, disparaging and
3 misrepresenting statements in the future.
4

5 106. In particular, plaintiff requests a judicial declaration wherein the court
6 orders that defendants, their agents, all persons acting on their behalf or
7 purporting to act on their behalf and all other persons in active concert and
8 participation with them, be and hereby are, permanently enjoined from
9 engaging in and/or performing directly, any of the following acts:
10

11 107. Defendants are prohibited from initiating contact with plaintiff and/or
12 any and all persons known to plaintiff and/or any and all associates of
13 plaintiff. Any complaints defendants may have concerning plaintiff must be
14 communicated to an associate of plaintiff who will be identified by plaintiff
15 for defendants.
16

17 108. Defendants are prohibited from making the following defamatory and
18 fictitious statements about plaintiff to third persons: plaintiff has been
19 involved in a murder case; that plaintiff has been charged with any crime
20 whatsoever; that plaintiff has been convicted of any crime whatsoever; that
21 plaintiff has a STD; that plaintiff is deceitful and/or acts fraudulently; that
22 plaintiff does not have a Ph.D; that plaintiff has taken an interest in, or ever
23 stalked and/or harassed any of them, etc.
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1 109. Defendants are prohibited from posting about plaintiff whatsoever,
2 including posting of his personal and private information, pictures, texts,
3 telephone number, address, medical information, etc.
4

5 110. Defendants are prohibited from filming (whether by video camera or
6 still photography) within fifty (50) feet of plaintiff and/or his premises.
7

8 111. Defendants are prohibited from using Facebook and/or any Meta social
9 media applications and/or such online platforms and/or apps (including, but
10 not limited to: Instagram, Whatsapp, etc.), and especially from participating
11 in any Facebook group and/or any other social media application and/or
12 platform and defendants are prohibited from using any and all online dating
13 applications and/or platforms.
14

15 112. Defendants are prohibited from reporting plaintiff to any third party
16 whatsoever.
17

18 **EXEMPLARY DAMAGES**

19 113. Plaintiff repeats and realleges the allegations contained in paragraphs 1-
20 112, inclusive, and by reference thereto incorporates the same herein as
21 though fully set forth at length.
22

23 114. The acts complained of herein and in the preceding paragraphs above
24 were done willfully, unlawfully, maliciously and in wanton disregard of the
25 rights and feelings of plaintiff and by reason thereof, plaintiff now demands
26 punitive and compensatory damages.
27
28

JURY DEMAND

115. Plaintiff requests a trial by jury on all claims.


WHEREFORE, Plaintiff prays for damages as follows:

- 1) For judgment in his favor on all claims asserted herein;
- 2) For a judgment deeming that any and all forthcoming judgment debt(s) owed by Ms. Blalock to Plaintiff to be non-dischargeable pursuant to 11 U.S.C. § 523(a)(6) based on the willful, malicious and intentional personal injury to Plaintiff by Ms. Blalock;
- 3) For costs of suit incurred herein; and
- 4) For such other and further relief as the Court deems just and appropriate.

DATED: 10 September 2024

Respectfully submitted,

By:


Dr. Stewart Lucas Murrey
Plaintiff & Plaintiff in Pro Se
Website: lucasmurrey.com
SocialMedia: sickoscoop.com/lucas